

Readiness and Emergency Management for Schools (REMS) Technical Assistance (TA) Center

ACCESS & FUNCTIONAL NEEDS FACT SHEET

Addressing Access and Functional Needs (AFN) in School and IHE Emergency Operations Plans (EOPs)

Background

Students or staff with AFN are those who need accommodations and modifications due to a temporary or permanent condition that limits their ability to take some actions in the event of an emergency. An access or a functional need may be due to physical, sensory, behavioral, mental health, intellectual, developmental, or cognitive disabilities; chronic conditions; injuries; and limited English proficiency (LEP) or an inability to speak English. These individuals may have physical, programmatic, or communication accessibility needs before, during, and after an emergency for which schools and IHEs should plan.

A Look at the Issue Today

Approximately 8 million people aged 24 and under had a disability in 2010, according to the U.S. Census Bureau.¹ Also, about 4.5 million public school students enrolled during the 2013-2014 school year were identified as English language learners (ELL)—those who participate in programs of language assistance such as English as a Second Language—according to the U.S. Department of Education (ED).² Additionally, there is a high number of students with Individualized Education Programs (IEPs) and Section 504 plans.

Relation to EOP Development and Emergency Management Planning

The *Guide for Developing High-Quality School Emergency Operations Plans (School Guide)*; <http://rem.s.ed.gov/K12GuideForDevelHQSchool.aspx> and the *Guide for Developing High-Quality Emergency Operations Plans for Institutions of Higher Education (IHE Guide)*; <http://rem.s.ed.gov/IHEGuideIntro.aspx> are joint products of ED; and the U.S. Departments of Justice (DOJ), led by the Federal Bureau of Investigation (FBI); Homeland Security (DHS), led by the Federal Emergency Management Agency (FEMA); and Health and Human Services (HHS). Both *Guides* provide examples of good practices and matters to consider for emergency planning and implementation purposes.

These *Guides* provide several key principles for emergency planning. One of these principles is ensuring that the needs of the whole school or IHE community are addressed, which includes those with AFN. The *Guides* also recommend a six-step planning process to help schools and IHEs develop a high-quality EOP that is flexible, adaptable, and customized to the building or institution level. To help ensure inclusive planning, the six-step planning process may be utilized as described below:

Step 1: Form a Collaborative Planning Team involves establishing a team that is composed of a core planning team, school or IHE stakeholders, and community partners. Here, representation from the AFN community is important to help ensure all aspects of the planning process take into account

¹ This is the latest available data. Previously, only data and analysis from 2005 was available.

² This is the latest available data. The "Condition of Education" reports are released annually.

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the needs of the community. For example, consider including the school psychologist or one of the special educators on the planning team.

In **Step 2: Understand the Situation**, the planning team identifies threats and hazards that are likely to affect the school or IHE and surrounding community. The team will use assessments such as a Site Assessment, Climate Assessment, and Capacity Assessment. Here, for example, the AFN representative(s) can help with examining the accessibility of the campus' buildings and identifying problems that may arise during an evacuation, such as the need to use evacuation chairs if elevators cannot be used.

In **Step 3: Determine Goals and Objectives** and **Step 4: Plan Development**, the planning team develops goals, objectives, and courses of action for each of the threats and hazards identified in Step 2, and then develops courses of action for accomplishing each of the objectives. The AFN representative(s) may be able to share how specific actions will affect staff or students with AFN who may need, for example, accessible communications to ensure they are aware of emergency alerts or able to receive assistance in an evacuation.

In **Step 5: Plan Preparation, Review and Approval**, the EOP is written, which will likely include the Basic Plan, Threat- and Hazard-Specific Annexes (i.e., goals, objectives, and courses of action for addressing threats and hazards) and Functional Annexes (i.e., goals, objectives, and courses of action for cross-cutting functions that may be needed in a variety of emergencies, such as communication and evacuation) sections. The planning team, with the support of the AFN representative(s), should confirm that any information related to the AFN community is integrated throughout the EOP.

Finally, in **Step 6: Plan Implementation and Maintenance**, the plan is shared in an accessible format or multiple formats with stakeholders, who are trained on the plan and their responsibilities. These duties could include providing personal assistance services to students and staff with AFN in an emergency. Exercises are also conducted to test the plan and the ability of the school or IHE to respond effectively. They should be planned with input from the AFN community to ensure exercises account for the needs of the community. In schools, education officials can now take extra steps to ensure the AFN of the whole school community is addressed. For example, emergency preparedness can be discussed at the IEP meeting.

Examples of Inclusive Planning

The *Guides* recommend that school and IHE EOPs include functional annexes to address critical cross-cutting functions or activities that apply to more than one threat or hazard, such as Communications, Evacuation, Shelter-in-Place, Lockdown, Accounting for All Persons, Reunification, Continuity of Operations Plans (COOP), Security, Recovery, and Health and Medical Annexes. The needs of students and staff with AFN should be addressed throughout these annexes, where applicable.

The following courses of action are examples that schools and IHEs have implemented to help meet the needs of students and staff with AFN in the areas of communications, evacuation, and sheltering-in-place:

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- **Communications.** Students and staff who are deaf or hard of hearing (DHH) may not be able to hear alarms or other emergency signals. To identify and respond to the needs of this population and others, the University of Massachusetts Boston has formed an Alert System Expansion Workgroup (REMS TA Center, 2016). This group includes an Adaptive Technology Specialist and Americans with Disabilities Act (ADA) Compliance Officer to research how to disseminate emergency messages. Fire and emergency alerts are now sent out via multiple modalities that use both visible and audible signals. For example, if external loud speakers are used for an alert, an accompanying text and email are also sent.
- **Evacuation.** After an emergency, individuals with AFN may be hindered from evacuating safely. For examples, wheelchair users may not be able to follow evacuation routes due to debris blocking their path or elevators being inoperable. To address this, the University of California Santa Barbara has created procedures for those who are unable to use stairs in an emergency. These procedures include identifying designated people who assist and escort individuals with mobility disabilities to a safe location, remain with the person while another individual alerts first responders of their location, and follow the instructions of first responders.
- **Shelter-in-Place.** For an incident that requires students or staff to shelter-in-place, school or IHE staff may first need to determine whether individuals who are DHH have heard the notice. As in the case of an incident at a school in the Los Angeles Unified School District, teachers and staff searched for and communicated individually with students who were not in class (REMS TA Center, 2016). In addition, staff checked with the nurse about medications that needed to be taken and planned for delivery of those medications. For students needing to go to the toilet when sheltering-in-place, those in wheelchairs were able to use a modified walker as grab bars.

Key Resources

Several Federal Websites are available that provide resources to help with inclusive planning. These include:

- **Office of Disability Integration and Coordination, FEMA.** This Office provides guidance, tools, methods and strategies to help establish equal physical, program and effective communication access to people with disabilities. FEMA has a Regional Disability Integration Specialist in each of its 10 regions who can provide support for disability-inclusive emergency planning.
<https://www.fema.gov/office-disability-integration-and-coordination>
For information on how to contact your FEMA Regional Contact, visit
<https://www.fema.gov/fema-regional-contacts>.
- **Emergency Preparedness Web Page on LEP.gov.** This section (of a larger Web page) provides materials and tips that can aid in the development of language accessible programming and services in emergencies, such as how to communicate without English in an emergency.
<https://www.lep.gov/resources/resources.html>
- **Emergency Preparedness Topic Filter on Disability.gov.** This Web page provides numerous resources to help create plans to support people with disabilities, such as a “Guide to Emergency Preparedness and Disaster Recovery.” Viewers can filter the information that is of most interest into specific topics, locations, audiences, and types of disabilities.
https://www.disability.gov/?s=&fq=topics_taxonomy:%22Emergency+Preparedness%5E%5E%22

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REMS TA Center Resources

The REMS TA Center Website also provides several resources that can help schools and IHEs with inclusive planning efforts. These include:

- **Guide for Developing High Quality School Emergency Operations Plans**, which describes planning principles and the six-step planning process to create a K-12 school EOP.
<http://rems.ed.gov/K12GuideForDevelHQSchoo.aspx>
- **Guide for Developing High Quality Emergency Operations Plans for Institutions of Higher Education**, which describes planning principles and the six-step planning process to create an IHE EOP.
<http://rems.ed.gov/IHEGuideIntro.aspx>
- **Integrating the Needs of Students and Staff with Disabilities and Other Access and Functional Needs**. This Specialized Training Package includes Instructions, a PowerPoint with speaker notes, and a Resource Guide on integrating the needs of students and staff with disabilities and other AFN into each step of the emergency operation planning process. The information can be used by individuals to self-teach, or to train others, such as in professional development opportunities.
<http://rems.ed.gov/TrainingPackage.aspx#sthash.f5RB2LWS.dpuf>
- **Integrating Students with Special Needs and Disabilities into Emergency Response and Management Planning**. This newsletter describes strategies that can be used by schools to integrate the needs of students and staff with AFN into emergency response and management planning, such as how to teach students with disabilities response strategies. In addition, the document lists several additional resources that can aid planning efforts.
http://rems.ed.gov/docs/Disability_NewsletterV2I1.pdf

References

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